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June 13, 2022

VIA ECF

Hon. John G. Koeltl
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: Rene v. 31 East 21 Express Inc. et al.
Case No.: 21-cv-7435 (JGK) (KHP)

Dear Judge Koeltl:

We represent Plaintiff in this action. We write to respectfully request that the Court extend the deadline to amend to the complaint from June 13, 2022 until June 24, 2022. This is the second request of this kind, and the sole answering Defendant consents to the request.

As Plaintiff noted in his May 9, 2022 letter, he anticipates amending the complaint to add an individual who he believes is a joint employer under the FLSA and NYLL, whose name Plaintiff learned from Defendant's discovery responses. Because the parties are engaged in mediation, however, they would prefer to avoid spending resources on motion practice and previously asked that the deadline to amend be extended to June 13, 2022, which was after the June 7, 2022 mediation date. However, the mediation had to be moved to June 17, 2022, and therefore Plaintiff requests that the deadline to amend the pleadings be further extended until June 24, 2022 so that the parties can focus their efforts on settlement.

Thank you for your attention to the above.

Respectfully Submitted,

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Michael Taubenfeld